

UNITED STATES OF AMERICA  
before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES ACT OF 1933  
Release No 10502 / May 31, 2018

SECURITIES EXCHANGE ACT OF 1934  
Release No. 83353 / May 31, 2018

INVESTMENT ADVISERS ACT OF 1940  
Release No. 4918 / May 31, 2018

INVESTMENT COMPANY ACT OF 1940  
Release No. 33111 / May 31, 2018

Admin. Proc. File No. 3-15514

In the Matter of

FRANK H. CHIAPPONE,  
ANDREW G. GUZZETTI,  
WILLIAM F. LEX,  
THOMAS E. LIVINGSTON,  
BRIAN T. MAYER, and  
PHILIP S. RABINOVICH.

ORDER GRANTING REQUESTS TO FILE SUPPLEMENTAL RESPONSE BRIEF OF 6,000  
WORDS AND TO FILE REPLY BRIEFS TO SUPPLEMENTAL RESPONSE BRIEF

On April 20, 2018, the parties in this matter were given the opportunity to file simultaneous supplemental briefs not to exceed 6,000 by May 21, 2018, and to file simultaneous response briefs not to exceed 3,000 words by June 4, 2018. On or before May 21, 2018, Respondents filed supplemental briefs; the Division of Enforcement submitted a filing stating that it would address the arguments that Respondents raised in their supplemental briefs in its response brief due June 4, 2018. The Division now requests that it be permitted to file a supplemental response brief not to exceed 6,000 words. Respondents William F. Lex, Brian T. Mayer, and Philip S. Rabinovich request that if the Division's request is granted they be permitted to file supplemental reply briefs on June 15, 2018; the Division does not oppose that request. Under the unique circumstances of this case, it is appropriate to grant these requests.

Accordingly, it is ORDERED that the Division of Enforcement may file a supplemental response brief not to exceed 6,000 words by June 4, 2018, and that all Respondents may each file a supplemental reply brief not to exceed 3,000 words by June 15, 2018.

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Brent J. Fields  
Secretary